

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Warren Easley
Plaintiff

✓

NO 1:21-CV-251

FILED

John Wetzel et al
Defendants

Honorable Judge Susan Baxter JUN 21 2023

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

Brief in support of motion to compel discovery and
Pursue sanctions

This is a §1983 civil action filed by a pro-se litigant currently at S.C.I. Rockview seeking monetary and compensation damages also injunctive and declaratory relief based on excessive force, Failure to protect, retaliation, Failure to train, cruel and unusual punishment, Failure to intervene, deliberate indifference.

Facts

Plaintiff has pursued discovery with defendants for 8+ plus months and have been unsuccessful. Plaintiff have been met with uncooperation, not provided documents, objections in bad faith, provide vague and unresponsive answers. Defendants have stated they sent documents requested in response but plaintiff never received. Plaintiff knows at this point defendants do such in bad faith as the magistrate judge gave them an order to provide discovery but did not. Defendants have sent the same medical progress notes 4 times totalling to over 2000 pages in bad faith. same documents sent 4 times. Clearly in bad faith. Plaintiff has write defendants letters to solve discovery issues to no avail.

Argument - Point 1

The discovery requested is very much correlated and relevant towards this civil claim

Defendants have disregarded Plaintiffs request for discovery along with judges order granting plaintiffs motion to compel. Defendants have not provided discovery that will be presented at trial / Summary Judgment. Such request are relevant towards this civil action but defendants have not provided clear / concise responses to interrogatories document request nor videos. Plaintiff cannot litigate pro-se or provide a proper defense in this civil claim as the discovery is refused to be provided by the defendants or vague responses are provided which is reiterated below.

interrogatories (Wright) Exhibit #1 First question "How long have you worked for the department of corrections? Please include titles."

which is a standard question. Defendants did not answer such question stating they need more time to get with authorities with such a simple question which is in bad faith. Not to mention defendants was given 6-7 months to get with "the proper authorities" to answer such a simple question all C.O.'s know or any professional.

question -3 How many cell extractions have you been a part of since you worked for the D.O.C. If you do not know

the exact #, Please estimate Defendants provide a vague and evasive response stating they don't have ~~enough~~
a of 27

question #4 All video Footage, documents, photographs, incident reports, interviews/investigations on 8-27-19 that is described in complaint or is related to such.
(Escort in restraint chair) Defendants state there are no documents for 8-27-19. This response is in bad Faith as plaintiff clearly put 8-27-19 as the date plaintiff is requesting documents. Plaintiff's response is in bad Faith. Request all documents, photographs incident reports, interviews/investigations on 8-27-19.

question #5 All video Footage, documents, photographs, incident reports, interviews/investigations on 8-29-19 that is described in complaint or is related to such (escort in restraint chair)
Defendants state see restriction forms below. First no restriction forms were provided. This response is in bad Faith as plaintiff requested documents, videos, photographs pertaining to incident in complaint on 8-29-19.

question #6 All video Footage, documents, photographs, incident reports, interviews/investigations on 10-7-19 that is described in complaint or is related to such. (Escort in restraint chair)

Defendants state see restrictions below. This was nothing pertaining to restrictions. Defendants response is in bad Faith. Plaintiff requested documents, videos, photographs ETC. regarding escort in restraint chair on 10-7-19. Defendants response is unresponsive and clearly in bad Faith. This is after a magistrate judge ordered defendants to provide plaintiff with

Discovery after 7 plus months of ignoring plaintiff. Defendants disregarded judge's order and rules of civil procedure. No documents have been provided regarding 10.7.19 (escort in restraint chair.)

question #7 All video footage, documents, photographs, incident reports, interviews/investigations on 10.7.19 that's described in complaint or is related to such. (Excessive force while in cell) Defendants state "see restrictions forms provided below": In bad faith. This is not regarding no restrictions. Plaintiff request documents, videos, photographs regarding a excessive force claim. Defendants provide no documents regarding such although such exist. Please see exhibit #17 which states "your claims were investigated and that investigation was reviewed by the Bureau of investigation and intelligence." But defendants withheld such documents and video in bad faith which supports sanctions as Judge Lazzillo gave defendants a order to provide all discovery due to plaintiff being granted a motion to compel. Defendants response is in bad faith.

question #8 All video footage, documents, photographs, incident reports, interviews/investigations on 12.10.19 that is described in complaint or is related to such (Escort in restraint chair.)

Defendants response is "see restriction forms below" such is mind boggling that defendant's send such response after having this request for 7 months and ordered by a judge to provide discovery. this response

is just clearly in bad faith, clear disregard of Judges orders and rules of civil procedure, such response supports sanctions.

question #9 All video Footage, documents, photographs, incident reports, interviews / investigations on 10-7-20 that is described in complaint or is related to such. Defendants state "there does not appear to be any documents relating to the 10-7-20 incident identified above" This is False. Please see exhibit # 18 "your allegations were investigated and that investigation was reviewed by the Bureau of investigations and intelligence." Defendants did not do due ~~diligence~~ diligence at all. All disregard Honorable Judge Canzillo orders. After 7 plus months its clear Defendant has no intentions of honoring judges orders or rules of civil procedure. Defendants response is blatantly in bad faith as there was a investigation regarding this incident described and nothing provided to plaintiff is in bad faith and support sanctions.

question #10 All video Footage, documents, photographs, incident reports, interviews / investigations on 11-7-20 that is described in complaint or is related to such (Excessive Force / or spray) Defendants state there are no documents relating to the 11-7-20 incident identified above. False. Any use of Force idl, incident reports will be written. Any o/c sprayed
507

a investigation would be began and investigated.
 Defendants are blatantly disregarding rules of civil
 Procedure and Judges order granting plaintiffs motion
 to compel. Such response supports sanctions.

question #11 Please provide all grievance's plaintiff Filed
while at S.C.F. Forest between march 2019 to April 2021
 Defendants do not provide discovery requested. At this
 point is no surprise. Defendants state they provide
 grievances 795379, 795381, 796182, 796397, 796828,
 796834, 802863, 803672, and 803676. Note the First
 Five plaintiff received. But only two pertain to this
 instant complaint (795379 and 795381) grievances
 796182, 796397 and 796828 do not pertain to this
 instant complaint. Plaintiff only mentions to show
 defendants responded in bad Faith. Plaintiff request
 all grievances Filed From march 2019 to April 2021
 which is all during times in this instant complaint.

question #12 All 709 (restriction Forms) that was lodged
on plaintiff From march 2019 through April 2021.
 Defendants responds "See attached documents".
 No restriction Forms are attached or sent to
 plaintiff. Such response is in bad Faith. At this
 point plaintiff is confused and angry that defendants
 appear to have some immunity to do as the please
 and ignore a Judges orders after 7 plus months of
 providing no discovery and disregarding Judges orders.
 6027

question #13 medical records of plaintiff from march 2019 through April 2021. Defendants state

"see attached medical records from 2019 through 2021."

False. Defendants provided medical progress notes in allotted time and not plaintiffs medical records. Defendant Scott Bradley is aware what medical records are such response is in bad faith. Plaintiff request medical records from march 2019 through April 2021 (time at Forest and times named in complaint).

questions #14, #15 #16 #17 #18 #19. Plaintiff request certain sections of policy that are relevant to plaintiffs complaint.

in all request. Defendant states "This will be made available to you" For all questions (#14, #15 #16 #17 #18 #19) Plaintiff has yet to review such. Plaintiff was not sent such at all and has not been told such requested documents were sent to anyone for plaintiff to Review.

Exhibit #19 Plaintiff's request for Production of Documents
Electronically stored video, photographs and Audio (Second)

question #3 1017 X records of Plaintiff the whole time Plaintiff
was housed at S.C.I. Forest in 2019 2020 and 2021

of course defendants did not provide the documents
and state such will be supplemented to plaintiff

Although plaintiff sent this discovery request over
7 months ago defendants disregarded the judges
order granting plaintiffs motion to compel.

question #5 copy of religious accommodation form that display
all Jewish holidays Fast, or any observances

Defendants state "see attached". Nothing was
attached. No documents pertaining to this interrogatory.
This response is in bad faith and defendant have shown
a pattern of such. Nothing was provided. The fact
the defendants continue to do such supports sanctions.

question #6 copy of Jewish Kosher menu at all time Plaintiff
was in the Kosher meal diet while housed at S.C.I. Forest

Defendants state "see attached D.O.C. Kosher sample
menu contents and Food handling instructions". Nothing was
attached or provided. Defendants not only falsify
documents but disregard Judges orders to provide
Plaintiff all discovery by granting plaintiffs motion
to compel. Its mind boggling that defendants can
do such without no reprimand. Defendants does such

as plaintiff is pro-se.
8/27/23

question #7 All documents that is required to obtain a kosher diet and to be taken off a kosher diet.
 Defendants state "www.eor.gov." has these documents which defendants is aware plaintiff does not have access to. such request is the purpose of discovery. of course such response is in bad faith and unresponsive.

question #8 copy of form that display why plaintiff was taken off the kosher diet and any/all documents that support such decision. Defendants state see "File produced in response to request 5 herein". No File was produced in response 5. such response is in bad faith, unresponsive and disregard judges order granting plaintiffs motion to compel after defendants ~~ignores~~ ignored plaintiffs discovery request for 7 plus months.

question #9 All documents in File Plaintiff File held by Hill, Klemm, or Shaffer (Defendants) that is in anyway involved with plaintiff on kosher diet taken off kosher diet as Jewish Fast. Defendants state see "File produced in response to request 5 herein". No File was produced in response 5. such response is in bad faith, unresponsive and disregard judges order granting plaintiffs motion to compel after defendants ignored plaintiffs discovery request for 7 plus months.

a record of this information. Furthermore plaintiff asked to estimate just to have a understanding Defendants has done such cell extractions before and the # can determine his knowledge / experience which is correlated to plaintiffs claim.

question #4 Have you ever been accused or investigated for excessive force Defendants provide a vague and automatic ~~question~~ response. These are very simple and standard questions that clearly pertain to plaintiffs claim. ~~Answer~~ response is vague and unresponsive. Defendants do such in bad faith.

question #5 Have you ever been disciplined, demoted, reprimanded, or suspended while working for the P.C.?

Defendants provide a vague response and not concrete in which a jury may understand if such response is yay or nay regarding evidence in this claim. Such question is relevant to show Defendant is capable of things that may against job description.

question #7 How much time total have you been working in level 5 housing unit.

Defendants appear to make the issue that plaintiff did not provide a legible or readable question. Plaintiffs question is clear and readable. Defendants refuse to answer question in bad faith. which is a pattern which plaintiff will show throughout this Brief/motion

interrogatories (Kathleen Hill) exhibit #7 question #1 Please
state the date you began your employment with the
department of corrections. Defendants state they will provide
this information when "proper authorities" obtain such
information. Defendants had 7 months to get this
information as defendants had this interrogatory request
7 months ago which is mind boggling as violates
many aspects regarding civil procedure and the
Judges orders. Defendants response is in bad Faith
as any employee knows when they began their
employment and titles. Defendants is clearly acting
in bad Faith.

question #2 Did you miss any time off due to injury
due to incident with plaintiff on 4-7-19?

Defendant responds that they don't want to give
 this information to a inmate Plaintiff is a
 Pro-se litigant. Beyond that such information is
 not privileged and very much correlated
 to plaintiffs claim. Response is in bad Faith.

question #4 Did you go to the hospital due to injury
after incident with plaintiff on 4-7-19?

Defendants state "see EOR report previously provided"
 No EOR speaks on a hospital trip. Beyond that
 response is vague and unresponsive. Clearly a standard
 simple question that is very much correlated to plaintiffs
 claim.

11-06-27

interrogatories LT Deal exhibit #3 question #5 Were you directed to keep plaintiff in restraint chair, if so who? Defendants state they don't know what date plaintiff is speaking on. Defendant Deal is on mandamus in one date in complaint as a defendant which is 8-17-19. Plaintiff request defendants answer such interrogatory.

question #6 Have you ever been under investigation for excessive force? Defendants states such is not relevant to case which is false. Plaintiff states in complaint that defendant deal left plaintiff in restraint chair unjustified even when plaintiff's restriction form stated "escort only" for restraint chair usage. Claim is very much correlated to plaintiff's claim and is relevant. Plaintiff request this interrogatory approached as it is relevant to claim.

question #7 Have you ever been disciplined, demoted, disciplined or suspended while working for the Department of Corrections. Defendants state such is over broad and exceeds the scope of matters in complaint. False such response is correlated to claim as it can show pattern, state of mind and defendants approach to D.O.C. rules and civil rights. Plaintiff's claims is correlated to interrogatory as defendant has a possibility of violating rules if done before.

interrogatories (Fajbik) exhibit #4 question #3 IF a inmate states he cant breathe do you think its appropriate to continue to hold a person neck down defendants state such interrogatory "assumes facts not in evidence" Note plaintiff stated defendant Fajbik grab him by the neck and squeezed his neck and held him down with all his weight. Which is iterated in complaint. Which is very much relevant to plaintiffs claims such objection is in bad Faith

question #4 How tall are you and how much do you ^{weigh} ~~much~~
 Defendants state such exceeds the scope of the matters complained of in False. Plaintiff iterated defendant Fajbik is well over 300 pounds and at least "4"3 tall which is relevant as plaintiff stated in complaint defendant Fajbik pin plaintiff down by his neck and placed all his weight on plaintiffs neck which can/will show the possibility of a broken neck or death due to such force and weight. Also supports the fact that Plaintiff suffered a concussion. This interrogatory is very much relevant to plaintiffs claims.

question #6 How many unplanned/planned use of force you have been a part of. C IF you dont know please estimate.

Defendants state they cannot estimate. Not only can they (defendant) estimate this information can be found out with ease "business as usual" which show such unresponsive interrogatory was in bad Faith.

question #8 Have you ever been demoted, disciplined, reprimanded, suspended or counseled while working for Department of corrections? Defendants state such interrogatory exceeds scope of matters complained of in False. Defendants could've very much been disciplined for plaintiffs claim. Beyond that such shows defendants state of mind and inclination towards Defendants approach to his duties and if defendants ever acted outside his scope of duties.

question #10 Have you ever been under investigation for excessive Force excluding plaintiffs claim. Defendants state plaintiffs interrogatory request exceeds the scope of the matters complained of in False. Plaintiff stated defendant used excessive force against plaintiff. Such response can show state of mind and defendants possibility to commit excessive force.

exhibit #5 interrogatory (Ull Klemm) question #9 Is it normal to have any bugs in any kosher vegetables
 defendant's response is "defendant is not aware of reports of any bugs in any vegetables"
 which is not the interrogatory plaintiff asked.
 Defendant's response is clearly vague and unresponsive as another question was responded to instead of interrogatory.

question #10 Is it normal to have any rotten apples/oranges in any kosher Fruits. defendant response is "defendant is not aware of reports of any rotten apples or oranges in any Fruits." which is unresponsive and a vague response and does not approach the interrogatory at hand.

interrogatory (mcgill) exhibit #16 question #7 were you ever counseled, disciplined, reprimanded or suspended while working for the department of corrections. Defendant's state even exceeds the scope of matters complained of in False. such claim is ~~not~~ iterated in plaintiff claim stating defendant mcgill consistently antagonize plaintiff. such response can show defendant's state of mind and how ~~his~~ defendant's perform his scope of duties or inclination towards D.C.'s Code of Ethics / policy.

question #10 How long have you been a registered nurse?

Defendant states such interrogatory is not relevant to Plaintiff's claims. False Plaintiff states defendant McGill did something out his scope of duties as a nurse and improperly tube-fed Plaintiff. The time defendant McGill has been a nurse may dictate his knowledge and expertise in medical procedures which can show Defendant had proper knowledge of tube feedings and the proper way to do such.

Exhibit #7 Interrogatory (Beauie Bell) question #1 Please state the date you began your employment with the department of corrections

Defendants state such interrogatory will be supplemented although defendants received this interrogatory request over 7 months ago. Such is done in bad faith as such request is simple and automatic.

question #2 Before feeding a person is it required to lube or wet the tip that is being inserted or is it best to use it dry with no lube or ointment/water.

Defendant provides a vague and unresponsive response in bad faith. Defendant knew "Force Feeding" is iterated through complaint and is very much "tube feeding." Defendant adamant on refusing to respond to Force Feeding when all other defendants responded to such is in bad faith.

question #3 Do you think any pain should be felt during a Force Feeding Defendants provide a vague and unresponsive response in bad faith. Force Feeding is uttered in initial complaint and rest of defendants responded to "Force Feeding". Beyond that defendant knows what Force Feeding is. Such response in in bad faith

question #4 In your medical opinion as a nurse do you think it is accurate to Jam the Force Feeding tube into a person nose or gradually insert in a person nose Defendants provide a vague unresponsive response stuck on the word "Force Feeding" and provide a robotic response that dont respond to interrogatory in bad faith.

question #5 Have you ever worked at a hospital? Defendants state such response will be supplemented to Plaintiff. Plaintiff sent this interrogatory request over 7 months ago. After numerous of motion to compel and the granted motion of compel defendants response is clearly in bad faith as defendants was given a order to respond but still dont.

question #6 Have you ever been in any branch of the military? If so which one and was you honorably discharged. Defendants state such request will be supplemented although such was requested over 7 months ago. Such response is in bad Faith.

question #7 Have you ever performed a Force Feeding before plaintiff? If so please provide a estimate on how many. Defendants response are vague and unresponsive making it appear that Force Feeding is a foreign word. Although medical term is "tube Feeding." Defendants know what Force Feeding is as such is a D.D.C. term and also littered in complaint. Such response is in bad Faith.

question #8 Is it possible to resist a Force Feeding if a person is not moving his body, neck or head. Defendants response is I do not force feed any inmate. Such response is in bad Faith as Force Feeding is very much correlated to tube Feeding and such is stated throughout plaintiffs complaints. Defendants response is in bad Faith.

question #10 Please identify, name, describe what
Policy, Procedure or memoranda you used to
reference while Force Feeding plaintiff.

Defendants response is in bad faith as
Defendants just state "I do not Force Feed
any inmate." Defendant is well aware of Force
Feeding which is a D.O.C. term. And such is
in plaintiff's complaint and only claims
plaintiff brings against defendant. Such response
is in bad faith.

Exhibit #8 interrogatory (Caltagirone) question #1. Please state the date you started your employment for the Department of corrections. Defendants state such response will be supplemented to plaintiff. Note Defendants was given a order to compel discovery over 30 days after plaintiff sent this interrogatory request over 7 months ago. This is clearly in bad faith as defendants had 7 months to respond to this interrogatory.

question #6 Have you ever been disciplined, demoted, counseled or reprimanded. Defendants state "Not to the best of Defendant recollection." which is vague and unresponsive as such could've taken place and is documented but it appears defendants aim to avoid question and not provided a blunt responsive interrogatory. which is done in bad faith. This information is something that can be proven or false. This response appears to be on the fence, which is not accepted as this is civil litigation. such response is in bad faith.

question #7 Have you ever been accused of excessive force excluding plaintiffs claims. Defendants response state "Not to the best of answering defendants recollection." such response is vague and unresponsive. As such response leaves the door open as if such could've taken place instead of provided a response that completely answer interrogatory. such response is in bad faith and vague (unresponsive).

question #8 How long have worked in a level 5 housing unit while you worked for the Department of corrections.

Defendants state they will need to supplement this response at a later date. Defendants had 7 plus months to respond to this interrogatory. This is a standard question. After 7 plus months and a order for the judge granting motion to compel from plaintiff and no answer this was done in bad faith.

question #9 on a estimate how many times have you utilized a double secure wicket while working for D.O.C. in a level 5 housing unit. (if you don't know

exactly please estimate) Defendant state that he cannot estimate which is in bad faith. The purpose of such estimation was to ensure a response as a exact number ~~number~~ may be difficult to pinpoint. Such response is in bad faith as to estimate is to attempt to find a number to support or respond to interrogatory. Note such claim is correlated to plaintiff's claim as defendant is accused of closing plaintiff's arm/hand in slot intentionally to cause harm. Such response is in bad faith.

Exhibit #9 interrogatory (Gill) question #1 Please state the date you began your employment with the Department of Corrections and please state all titles while working for D.C. including dates. Defendant states this information will be supplemented. This interrogatory was sent over 7 months ago. Defendants are abusing civil rules of Procedure. And disregard the Judges order regarding motion to compel which was granted in plaintiffs favor. Response is in bad faith.

question #4 When a cell is contaminated with a/c spray
Please iterate what measures are to be taken to
decontaminate such cell/ Area. Defendants response is vague and unresponsive by stating "there is a procedure in place once a/c is sprayed" even response does not respond to interrogatory and is unresponsive and vague.

question #8. Have you been demoted. Plaintiff Defendants response stating not to my recollection is vague and unresponsive and is done in bad faith. even response is relevant to this complaint as plaintiff has stated defendant has acted outside his scope of duties.

Exhibit #10 Interrogatory (Brown) question #1 Please state the date you started your employment at Department of corrections including titles. Defendants state such response will be supplemented to plaintiff although defendants had 7 plus months to answer this interrogatory. Such response not only violate Rules of civil procedure but such response is in bad faith after 7 motion to compel and judge magistrate Lanzillo granting plaintiff's motion to compel to respond to plaintiff's motion to compel. Defendants still do not respond in bad faith.

question #3 Have you ever received training regarding Force Feeding? Defendants state "Department of corrections does not force feed inmates. they do court ordered tube feedings." Such response iterate that defendants know exactly what plaintiff is stating when Force Feedings is mentioned. Beyond that such "Force Feedings" is stated in complaint and is the only claim defendants are complained of in complaint. Such response is in bad faith as "force feedings" is very much "tube feedings." Beyond that it is called Force Feeding in D.O.C.

question #4 Have you ever performed a Force Feeding before you Force Fed plaintiff? Defendants appear to Not know what "Force Feedings" are although such is mentioned all throughout complaint when name defendant. Such response is in bad faith.

question #7 How many Force Feedings have you performed?
If exact number is not known please estimate. Defendants
state they cannot estimate in bad faith. Defendant continue
to disregard magistrate Judges order to compel discovery
after ignoring plaintiffs request for 7 plus months. Defendants
have abused this process due to plaintiff being
Pro se.

Please see exhibit #11 #12 #13 Defendants still did not
respond to these interrogatory request even after the
Judges order granting plaintiffs motion to compel. 7 plus
months have passed and defendants clearly in bad
faith disregard Rules of civil procedure and the Judges
order to compel discovery after 7 months of ignoring
plaintiff. Defendants appear to be above civil procedure
and have immunity as they disregard for civil procedure and
the Judges orders are very much evident and support
sanctions. Plaintiff request a response to interrogatories
(exhibits #11 #12 #13) and sanctions against defendants.

Exhibit #14 Plaintiff request For Production of Documents
electronically stored, video, photographs and Audio.

question #2 All video Footage, documents, photographs, incident reports,
interviews/investigations on 5-21-19 that is described in complaint
or is related to such (cell extraction, sprayed with O.C. F.B.I.D.)
Defendants response is in bad Faith as this incident
named on 5-21-19 was investigated by Bureau of investigations
and intelligence (B.I.I.) please see exhibit #15. Defendants
withold such documents and investigation documents.

Beyond that plaintiff has not been provided no photographs
at all regarding this incident, only (d) initial reports.
Defendants withold such documents and photographs in
bad Faith, which support sanctions due to magistrate Judge
ordering defendants to provide plaintiff discovery granting
plaintiffs motion to compel.

question #3 All video Footage, documents, photographs, incident
reports, interview/investigation on 6-21-19 that is described
in complaint or is related to such (Dry cell abuse)

Defendants response is in bad Faith. No documents
have been provided nor photographs. Please See exhibit #16.
Defendants state "medical records and attached photos."
None was supplied in bad Faith. exhibit #16 States this
incident was reviewed by the Bureau of investigations
and intelligence (B.I.I.). Defendants provide no documents
in bad Faith, and no video in bad Faith.

question #10 All emails defendants Hill, Klem, / Shaffer
correspondence with each other regarding plaintiff and his
Jewish Faith and diet. defendants state "see plaintiffs
religious file produced in response to Request 5"

No file was produced in response 5. Such response is
in bad Faith, unresponsive and disregard judges order
granting plaintiffs motion to compel after defendants
ignored plaintiffs discovery request for 7 plus months.

question #18 Please name the restraint chair provider that was
used on plaintiff that is described in complaint.

Defendants state they cannot exactly be certain what
chair was used. False. All use of Force items are
logged and named. Such response is in bad Faith.

And with proper investigation this could've easily been
found out. Defendants continue to be unresponsive and
respond in bad Faith.

question #19 copy of level 5 housing unit handbook at S.C.I.
Forest when plaintiff was housed there in incidents
described in complaint. Defendants state handbook

attached. False nothing has been provided. Defendants
aim to mislead and falsify documents. Such response
is in bad Faith. Plaintiff never received this
handbook. This supports sanctions.

questions #20, #21, #22, #23, #24 and #25 Plaintiff requested
the following policies (610 Food services) (001 inmate abuse)
(201 use of force) (13.02.01 access to healthcare) (13.01.01 management
and administration of healthcare) (15.01.01 safety)

Defendants state plaintiff is to go to
www.cor.pa.gov. Plaintiff does not have access to
such. Plaintiff has wrote law library to me avail.

Such policies are relevant to complaint and plaintiffs
claims and such response is "business as usual" defendants
response is in bad faith.

Plaintiff request this motion granted in
its entirety.

W/E
6-13-23

Warren Easley KA1544
Box -A
1 Rockview Place
Bellevue PA 16823